

EXHIBIT “A”**RICO STATEMENT****QUESTION #2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
The Abdul Aziz al Ibrahim Foundation	<p>The Abdul Aziz al Ibrahim Foundation has long provided financial support and other forms of material support to terrorist organizations including but not limited to Radical Muslim Terrorism, or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders. The Abdul Aziz al Ibrahim Foundation conducted or participated directly and/or indirectly in the conduct of the Enterprise’s affairs and participated in the operation or management of the operation of the Enterprise itself. The Abdul Aziz al Ibrahim Foundation conspired to conduct and/or participate in the operation or management of the enterprise itself.</p> <p>HRH Prince Abdul Aziz al Ibrahim (or “Ibrahim Abdul Aziz Al Ibrahim”) is a Saudi citizen and the brother-in-law of King Fahd of Saudi Arabia.</p> <p>In 1990, he created the Abdul Aziz Al Ibrahim Foundation (a.k.a. Ibrahim Abdul Aziz al Ibrahim Foundation) whose official stated aim is humanitarian assistance. The organization is present in Kenya, Bosnia, Chechnya, South America and Southern Asia.</p> <p>The Abdul Aziz Al Ibrahim Foundation has built, among others, mosques in Düsseldorf, Gibraltar, Milan and Moscow. The Sheik Ibrahim Mosque in Caracas, the continent's second largest mosque, was built with funding from the Ibrahim bin Abdul Aziz Al Ibrahim Foundation, according to Iman Omar Kaddoura. The Saudi royal family established the foundation to help the spread of Islam.</p> <p>The organization’s branch in Nairobi, Kenya was associated with Osama bin Laden’s network, as uncovered by the FBI’s investigation into the attacks against the American embassies on August 7, 1998, as was revealed in the confidential publication, <i>French Africa Online</i>.</p> <p>In August 1998, Kenya became the focal point of the international news following the bombing of the U.S. embassies there and in neighboring Tanzania. The attack on</p>	1962(a) 1962(c) 1962(d)

	<p>the embassy resulted in the death of some 400 Kenyans, as well as twelve embassy staff members; thousands of Kenyans were wounded, many grievously. In addition to the human suffering caused by the bombing itself, the incident had further repercussions for the human rights situation.</p> <p>Fazul Abdullah Mohammed, an al Qaeda operative implicated in the 1998 US Embassy bombings, was arrested and searched by Kenyan authorities. One of the items seized with him was a notebook containing the business card of al Ibrahim Foundation's director, Abdul Kader M. Izzi. He was also carrying a business card of Mohamed Munir Chaudhri, the lawyer used by Wadi al Hage and al Qaeda operative, Khalid al Fawwaz.</p> <p>In September 1998, the Kenyan government cancelled the registration of five Islamic relief agencies for allegedly supporting terrorism including Al-Haramain Foundation, Help African People, the Islamic Relief Organization, the Abdul Aziz Al Ibrahim Foundation, and Mercy Relief International. The authorities claimed that materials for the bomb were smuggled in as relief aid with the help of Islamic relief agencies.</p> <p>The decision was announced by the Kenyan government's NGO coordinator who declared that:</p> <p style="padding-left: 40px;">Our investigations reveal that the operations of these organizations are inconsistent with the reasons for which they were registered . . . These organizations are supposed to work for the welfare of Kenyans, but are instead endangering Kenyan's lives . . . They had been found to be working against the interests of Kenyans in terms of security.</p> <p>After several organizations appealed this decision, Kenya's High Court has blocked the deregistration of four of the five non-governmental organizations. The International Islamic Relief Organization, Moslem World League, Al-Haramain Foundation, and Mercy International Relief Agency can still operate pending an appeal. Only the Abdul Aziz Al Ibrahim Foundation remained blocked.</p> <p>First, the event drew international attention from the domestic human rights problems in Kenya. Second, the government's</p>	
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	<p>response to the bombing was to crack down indiscriminately against foreigners and Muslim-run nongovernmental organizations (NGOs). Refugees, without distinction, were told to report to the immigration authorities and informed that documents issued by the U.N. High Commissioner for Refugees to them were no longer valid. When accredited refugees, with UNHCR letters, presented themselves at immigration, these letters were taken away and they were given papers that deemed them illegal immigrants.</p> <p>In a study paper dated October 1999, called <i>The New Azerbaijan Hub: How Islamist operations are targeting Russia, Armenia and Nagorno-Karabagh</i>, Yossef Bodansky, Senior Editor of Defense and Foreign Affairs' Strategic Policy refers to the Abdul Aziz Al Ibrahim Foundation as one of those which provided help to Osama bin Laden:</p> <p style="padding-left: 40px;">The key Islamist facilities are concealed as charity and educational organizations affiliated with the web used by bin Laden's networks. Moreover, the headquarters of these organizations are stuffed with Arab "teachers" and "managers" from the ranks of such organizations as the International Muslim Brotherhood, the Islamic Salvation Front, several branches of Islamic Jihad, and the National Islamic Front of Sudan. The key organizations are . . . Al Ibrahim Foundation. Very little is known about this Baku-based charity except that its Arab principals have huge amounts of cash in hard currency. They are involved in acquisition of real estate among other "educational" projects.</p> <p>Other reports suggest that Ibrahim bin Abdul Aziz Al Ibrahim Foundation was funding the Islamic Movement of Uzbekistan (or "IMU"), an affiliate of al Qaeda, whose leaders met Osama bin Laden in 1999 in Kandahar, Afghanistan. Reports stated that the IMU received \$270,000 dollars from the Abdul Aziz Al Ibrahim Foundation.</p> <p>In 1999, the Russian special services and reconnaissance disseminated a report stating that Chechen militants were allegedly being trained in three paramilitary bases in Azerbaijan and that three Islamic organizations - the Abdul Aziz Al Ibrahim Foundation, World Youth Islamic Assembly, and Islamic Rescue Organization - had taken part in setting up</p>	
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	<p>these bases.</p> <p>The foreign Islamic aid, which has been granted under the banner of da'awa ("summon to Islam"), has been targeted at Russia's Muslim population in the Volga-Urals, the North Caucasus, and Central Russia. Its major official benefactor has been King Fahd of Saudi Arabia, who has regularly subsidized an annual hajj (pilgrimage) to Mecca and Medina for hundreds of Russia's Muslims. He has also sponsored dozens of scholarships to those who wanted to study at Islamic universities and colleges in Saudi Arabia, Turkey, Jordan, Syria, Libya, Kuwait, the United Arab Emirates and Malaysia, and subsidized the free distribution of Korans and other Islamic literature in various Islamic communities of Russia. Among other providers of official Islamic assistance are the University of Imam Muhammad bin Saud, the Islamic Development Bank, the Organization of Islamic Conference, the World Islamic League, the World Association of Islamic Youth and the World Center of Islamic Sciences of Iran.</p> <p>Unofficial Islamic assistance has been even more impressive. It has been conducted by Kuwait's Committee of Muslims of Asia, the Iranian World Organization Madaris, Saudi Arabia's Islamic Charities of Taiba and al-Ibrahim Foundation, the International Islamic Charities of Ibrahim Hayri, Igatha, Zamzam and the United Arab Emirates' Islamic Charity Organization Al-Khairya. Along with building and staffing mosques, madrassas, Islamic universities and other Islam-related institutions, these funds have heavily invested in the proselytizing conducted by Islamic missionaries and the organizing of various Islamic training camps and courses.</p> <p>Some Islamic organizations in a few countries also acted as outside players financing the IMU's activities and operations. Pakistani Jamaat-e-Islami, the Qatar Charity Society, the Saudi Islamic Salvation Foundation, the Ikhwan Al-Muslimun, and the World Assembly of Muslim Youth (WAMY) were such supporters.</p> <p>In the spring of 1999, an IMU delegation visited Saudi Arabia and received \$270,000 dollars from the Abdul Aziz Ibrahim Foundation, a relief organization of the Saudi royal family. A few months later the Taliban allocated \$50,000 dollars to support the families of the IMU members based in Afghanistan. In early August of the same year, Bin Laden's five personal envoys visited the village of Hoit in</p>	
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	<p>Tajikistan and delivered \$130,000 dollars to Namangani. At that time, IMU fighters were carrying out incursions into Uzbekistan via southern Kyrgyzstan.</p> <p>Shortly thereafter, a meeting took place in Karachi between the members of Islamic organizations from Pakistan, Kuwait, Jordan, Egypt, Palestine, Kashmir, Uzbekistan, and Chechnya. They agreed to raise two million dollars to support the Holy Jihad against Karimov's regime.</p> <p>In June of 2000, IMU's press-secretary Zubair ibn-Abdurahman confirmed the receipt of a few thousand dollars from Bin Laden intended to stir up 'the holy war against Karimov's pro-Zionist government'. According to the Ferghana Province Directorate of National Security, Juma Namangani annually received around three million dollars from Osama bin Laden.</p> <p>During an investigative television program by the Russian NTV, on November 1, 2002, it was disclosed that in July 2002, more than a hundred young men from various regions of Russia attended a seminar organized by the clerical board of Muslims of the Asian part of Russia at Pervouralsk. The official goal of the event was to instruct to religious matters. One of the courses was based upon a study in sharia disciplines, published by Ibrahim bin Abdul Aziz Al Ibrahim, which emphasized:</p> <p style="padding-left: 40px;">Armed struggle in the name of Allah, for his word to be above all else...Sacrifice your life in witness of Allah's religion.</p> <p>According to a document summarizing the seminar, "the main task of the seminar was to select candidates for further instruction at Saudi universities, and to raise the level of Islamic awareness." After the NTV findings, an investigation was conducted and a criminal procedure is pending in Russia.</p> <p>The event took place at the Middle Urals Kaziat Muslim community, where Abdullah bin Abdul Muhsen al Turki settled in 1995 a Joint committee for Islamic Action and Studies with representatives from the Muslim World League, Islamic International Relief Organization, and World Assembly for Islamic Youth, along with the Ibrahim bin Abdul Aziz Al Ibrahim Foundation.</p>	
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	<p>Saudi-funded textbooks and other publications reveal the presence of institutionalized hate speech. These products are distributed by Saudi officials — including senior diplomats at the Saudi Embassy — as well as by Saudi-funded organizations, such as the Abdul Aziz al Ibrahim Foundation, the World Assembly of Muslim Youth (WAMY), and the Institute for Islamic and Arabic Studies in America (IIASA), groups that take full advantage of America’s First Amendment freedoms.</p> <p>The book, <i>Deen al-Haqq</i> (The True Religion), authored in Arabic by Abdul-Rahman Bin Hamad Al-Omer, printed by the Ministry of Islamic Affairs and Endowments, paid for by the foundation of Abdul-Aziz Al Ibrahim, and distributed by IIASA and WAMY in the U.S. contains the following:</p> <p>“Judaism and Christianity are deviant religions” (page 25)</p> <p>“The Saved Sect – Muslims are many in number but few in reality, and the groups that claim to be Muslim are many, approaching 73 sects and numbering more than 1 billion.” (An assertion that only Wahhabis are Muslims and all other true Muslims are unbelievers.– page 47)</p> <p>“(Negations of One’s Islam) [Negation 8] - Befriending the unbelievers, through loving and cooperating with them while knowing that they are unbelievers, makes those who are their friends the same as them.” (page 99)</p> <p>“We say to every Christian and every Jew and all those outside Islam, ‘your children are born into Islam, but you and their mother take them away from Islam with your corrupt rearing.’” (page 119)</p> <p>“There are groups in the Muslim world that claim to be Islamic but they are outside Islam. They claim Islam while in reality they are not Muslims because their beliefs are the beliefs of unbelievers.” (page 123)</p> <p>Abdul Aziz al Ibrahim, founder of the Abdul Aziz al Ibrahim Foundation, also had many other U.S. contacts.</p>	
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	<p>In 1989, he acquired a portion of the Marina Del Rey real estate venture in Los Angeles through various offshore companies. Al Ibrahim did this to mask the company's connection to the Saudi royal family. A bank account was opened in Luxemburg as a shelter from public disclosure of the company's financial identity and activity. Al Ibrahim set up 10 companies in California as shell corporations to be the named owners of the real estate holdings of the company. However, he used his company in the Cayman Islands, Marina Enterprises, to control 100% shareholder interest for each of the 10 California shell corporations. On paper, these shell companies were to be managed by Newfield Enterprises, a front company set up by al Ibrahim for real estate purposes. Al Ibrahim also formed North American Real Estate Holding and named it 100% controlling shareholder of the Cayman Island company, Marina Enterprises.</p> <p>American authorities discovered a loan of \$132 million that was granted to al Ibrahim at the end of 1989 by Bank of Credit and Commerce (BCCI). Al Ibrahim was one of BCCI's leading loan beneficiaries.</p> <p>Between 1986 and 1990, BCCI was involved in the fraudulent schemes and practices of the NCB Chairman Khalid Bin Salim Bin Mahfouz, who was also the Chief Operating Officer of BCCI and major shareholder.</p> <p>The 1992 US Senate report on the BCCI affair detailed the role played by the NCB in hiding BCCI assets in a development in the "cover-up and obstruction of investigation".</p> <p style="padding-left: 40px;">In September of 1990, Price Waterhouse learned that BCCI had concealed further lending of over \$500 million to its major customs by "parking" that lending with a Middle Eastern bank, namely, the National Commercial Bank of Saudi Arabia controlled by Khalid bin Mahfouz, the most powerful banker in the Middle East, who was later indicted in the United States in connection with his activities pertaining to BCCI and First American.</p> <p>Khalid Bin Mahfouz was indicted on July 1, 1992 on charges of participation in a Scheme to Defraud in the First Degree in</p>	
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	<p>violation of N.Y. Penal Law § 190.65, in connection with certain acts and omissions relative to BCCI Holdings and certain related entities. The indictment alleges a series of misrepresentations, sham loans, and fraudulent conduct in failing to disclose the status of defendant's interest in BCCI. Pursuant to the indictment, an arrest warrant was issued. A settlement with US authorities resulted in approximately \$190 million paid to the Court Appointed Fiduciaries with an additional \$10 million paid to a plaintiff. The settlement agreement regarding the plea and cooperation with the District Attorney of New York and the Department of Justice concerned Khalid Bin Mahfouz and the National Commercial Bank.</p> <p>The 1992 US Senate Report on the BCCI Affair has linked the bank to financial funding of the Afghan war.</p> <p>(...) BCCI may have been moving money through the National Bank of Oman to fund the war in Afghanistan. The bank's role began to surface in the mid-1980's (...). This was confirmed in the Wall Street Journal of 23 October 1991 which quotes a member of the late General Zia's cabinet as saying 'It was Arab money that was pouring through BCCI.' The Bank which carried the money on from Oman to Pakistan and into Afghanistan was National Bank of Oman, where BCCI owned 29%.</p> <p>The BCCI was also implicated in supporting terrorism, as reported by the US Senate.</p> <p>In the course of targeting BCCI for laundering drug money, the CIA learned of BCCI's involvement in manipulating certain financial markets, in arms trafficking, and in supporting international terrorism, including handling the finances of Sabri Al-Bannah or Abu Nidal, and his terrorist organization.</p> <p>The Senate investigative Report detailed the initial involvement of the BCCI in terrorism financial support.</p> <p>BCCI's support of terrorism and arms trafficking developed out of several factors. First, as a principal financial institution for a number of</p>	
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	<p>Gulf sheikhdoms, with branches all over the world, it was a logical choice for terrorist organizations, who received payment at BCCI-London and other branches directly from Gulf-state patrons, and then transferred those funds wherever they wished without apparent scrutiny. Secondly, BCCI's flexibility regarding the falsification of documentation was helpful for such activities. Finally, to the extent that pragmatic considerations were not sufficient of themselves to recommend BCCI, the bank's pan-third world and pro-Islam ideology would have recommended it to Arab terrorist groups.</p> <p>The Report gives details regarding the facilities provided by the bank to known terrorist Abu Nidal and other terrorists.</p> <p>In the United Kingdom, a key window on BCCI's support of terrorism was an informant named Ghassan Qassem, the former manager of the Sloan Street branch of BCCI in London. Qassem had been given the accounts of Palestinian terrorist Abu Nidal at BCCI, and then proceeded, while at BCCI, to provide detailed information on the accounts to British and American intelligence, apparently as a paid informant, according to press accounts based on interviews with Qassem. As of 1986, the information obtained about Abu Nidal's use of BCCI was sufficiently detailed as to justify dissemination within the U.S. intelligence community. In July, 1987, as a result of the information provided by Qassem, a State Department report concerning Abu Nidal and Qassem, declassified in 1991 at the request of the subcommittee, describes Abu Nidal's use of BCCI. (...) Other terrorist groups continued to make use of BCCI, including one "state sponsor of terrorism," and the Qassar brothers, Manzur and Ghassan, who have been associated with terrorism, arms trafficking, and narcotics trafficking in connection with the Government of Syria (...).</p> <p>Apart from being a lead investor in Marina Del Rey, Al Ibrahim real estate assets have included Ritz-Carlton hotels in</p>	
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	<p>New York, Washington and Houston and Aspen, a hotel and office complex near Chicago's O'Hare International Airport, undeveloped property in the hills high above Bel-Air and largely vacant land near Disney World in Florida. Ritz-Carlton hotels decided in 1997 to pull back their name from the facilities by terminating management agreements after they became controlled by Al Anwa USA, a company owned by Abdul Aziz Al Ibrahim.</p> <p>The al Ibrahim partnership that holds Marina Del Rey's biggest real estate portfolio, MGC Commercial, filed Chapter 11 bankruptcy protection in June of 1995. The action was filed in the US Bankruptcy Court for the Central District of California.</p> <p>MGC Commercial's filing came just as lenders, owed about \$50 million in defaulted mortgages, were about to take possession of a half-dozen multi-family and commercial/retail properties. It also came barely two years after confirmation of a previous Chapter 11 reorganization plan - the plan through which Sheik Abdul Aziz al Ibrahim took full control of the big marina portfolio from former partner Abraham M. Lurie.</p> <p>The <i>L.A. Business Journal</i> reported the al Ibrahim-controlled partnership that holds the 369-unit Doubletree Marina Beach hotel has also defaulted on a mortgage - and is under a court-appointed receiver's supervision. The sheik also controls a partnership that holds two other Marina hotels.</p> <p>The registered President of Al Anwa USA is Tarek Ayoubi, who also manages Anwa Hotel & Resort International, Luxury Holdings Inc., MDR Hotel, and NY Overnight Inc., all based at the same address in Marina Del Rey.</p> <p>Al Anwa Holding is Al Anwa for Contracting Establishment (a/k/a Al Anwae Trading and Contracting Establishment, a/k/a Anwae Contracting Est) a construction company owned by Abdul Aziz Al Ibrahim. Al Anwa for Contracting is shareholder, along with Dallah al Baraka (Chaired by Saleh Abdullah Kamel), of the National Environmental Preservation Co. Ltd. in Jubail, Saudi Arabia.</p> <p>In 1991, Abdul Aziz Al Ibrahim, his brother, Walid, and Saleh Abdullah Kamel, created the leading Arab television satellite service, Middle East Broadcasting Corp (or "MBC"), which purchased the press agency United Press International</p>	
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	<p>(or "UPI") in 1992.</p> <p>Since 1993, funds and companies having the purpose of expanding their ideas of religious extremism ("Al-Igasa", "CAAP", Worldwide Assembly of Islamic Youth, "Al-Ibrahim") legally operated in the territory of Tatarstan, a member of the Russian Federation in the Ural Mountains. Practically all religious schools and a number of large educational institutions are opened or are secretly financed by wahhabist international organizations ("Taiiba", Committee of Moslems of Asia, Islamic Heritage Revival Society), and the libraries are completed with the literature of wahhabist nature.</p> <p>In March 2002, searches by Bosnian authorities of BIF's offices in Sarajevo, Bosnia-Herzegovina (operating under the name <i>Bosanska Idealna Futura</i>) yielded a substantial amount of evidence shedding light on the network al Qaeda established, including links to al Ibrahim. Shortly thereafter, the offices of al Haramain were raided in Bosnia, as well.</p> <p>In that raid they came across documents containing the home and office phone numbers of al Ibrahim and the al Ibrahim Foundation.</p> <p>The raids produced several documents offered into evidence in Government's Evidentiary Proffer Supporting the Admissibility of Co-conspirator Statements, <i>United States v. Enaam M. Aranout</i>, No. 02 CR 892 (N.D. Ill. filed January 6, 2003).</p> <p>The Abdul Aziz al Ibrahim Foundation has thereby knowingly, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, to support the terrorist organization's global jihad. The September 11th Attack was a direct, intended and foreseeable product of the aforementioned Abdul Aziz al Ibrahim Foundation's participation in the jihad campaign for al Qaeda, and/or Radical Muslim Terrorism, and/or the International Front for the Jihad Against Jews and Crusaders.</p>	
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